

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

In the Matter of the Search of
 (Briefly describe the property to be searched
 or identify the person by name and address)

)

Case No. 1:20-MJ-00351

Priority Mail Express, Label Number, EJ 176363440 US, addressed to
 Pinterest, 9114 adams ave, huntington Beach CA 92646, with a return
 address of Eric little, 5662 Deerfeild Rd loveland OH 45140.

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APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

Priority Mail Express, Label Number, EJ 176363440 US, addressed to Pinterest, 9114 adams ave, huntington Beach CA 92646, with a return address of Eric little, 5662 Deerfeild Rd loveland OH 45140.

located in the Southern District of Ohio, there is now concealed (identify the person or describe the property to be seized):

A quantity of a controlled substance and/or proceeds which are evidence thereof, and/or contraband, in violation of Title 21, United States Code, Section 841(a)(1).

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- evidence of a crime;
- contraband, fruits of crime, or other items illegally possessed;
- property designed for use, intended for use, or used in committing a crime;
- a person to be arrested or a person who is unlawfully restrained.

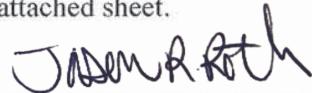
The search is related to a violation of: Title 21

Code Section	Offense Description
21 U.S.C. 841 (a) (1)	Possession with intent to distribute a controlled substance

The application is based on these facts:

See attached affidavit of U.S. Postal Inspector Jason R. Roth

- Continued on the attached sheet.
- Delayed notice _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

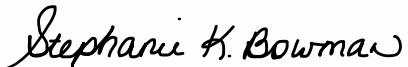


Applicant's signature

Jason R. Roth, U.S. Postal Inspector

Printed name and title

Sworn to before me and signed in my presence. **via electronic means.**



Judge's signature

Date: May 12, 2020

City and state: Cincinnati, Ohio

Stephanie K. Bowman
 United States Magistrate Judge

Printed name and title



AFFIDAVIT

I, Jason R. Roth, having been duly sworn, depose and state:

1. I am a United States Postal Inspector, having been so employed since February 23, 2013. I am presently assigned to the Cincinnati Field Office, Pittsburgh Division of the United States Postal Inspection Service (USPIS) with investigative responsibility for southwest Ohio and northern Kentucky. Part of my investigative responsibility involves the use of the United States Mail in the illegal transporting of narcotics and other dangerous controlled substances and financial proceeds relating thereto.
2. Your Affiant completed United States Postal Inspection Service Basic Training in May 2013. The training involved narcotic investigation techniques, chemical field tests and training in the detection and identification of controlled substances being transported in the United States Mail. In addition to this formal training, your Affiant has worked since May 2013 with various federal, state and local law enforcement agencies in the investigation of the transportation of illegal drugs and their identification.
3. This Affidavit is made in support of a search warrant for the following property, namely a package associated with the following United States Postal Service (USPS) Priority Mail Express, Label Number:

- a. **EJ 176363440 US** (the "Package")

This Affidavit is made in support of a warrant to search the Package for evidence of a crime as well as contraband, fruits of a crime or other items illegally possessed in relation to the following offenses:

- a. Possession with Intent to Distribute Controlled Substances, in violation of Title 21, United States Code, § 841.

Because this Affidavit is submitted in support of the application of the United States to search the Package, it does not include every fact known concerning this investigation, I have set forth facts and circumstances that I have relied upon to establish probable cause to justify the issuance of a warrant to search the Package. The Package is currently located at the USPIS Cincinnati Field Office.

4. Your Affiant has become aware that drug traffickers frequently use Priority Mail Express and/or Priority Mail, services offered by the USPS, to transport narcotics and other dangerous controlled substances. As a result of investigations and successful controlled substance prosecutions where Priority Mail Express and/or Priority Mail were used, your Affiant has learned of certain characteristics indicative of other Priority Mail Express and/or Priority Mail items previously identified as containing narcotics or other dangerous controlled substances. Some of these characteristics include, but are not necessarily limited to or used on every occasion - false or non-existent return address,

addressee is not known to receive mail at the listed delivery address, the package is heavily taped, the package is mailed from a known drug source location, labeling information contains misspellings, the label contains an illegible waiver signature, unusual odors emanating from the package, and the listed address is located in an area of known or suspected drug activity.

5. From your Affiant's training and experience, I am aware the U.S. Postal Service's Express Mail service was custom-designed to fit the needs of businesses by providing overnight delivery for time-sensitive materials. Business mailings often contain typewritten labels, are in flat cardboard mailers, and usually weight less than eight (8) ounces. In addition, corporate charge accounts were developed by the Postal Service so businesses may enter their account number on the Express Mail label and thus avoid time-consuming cash payments for each business mailing. With an account number listed on the label, business persons need not wait in lines to mail overnight business communications.
6. Through training and experience, your Affiant realizes it is not uncommon for drug traffickers engaging in drug transactions through the mail to store narcotics, their proceeds, or packaging materials, etc., in the presence of one another. Therefore, it would not be uncommon for an odor of a controlled substance to be present on the package, packaging materials, or contents of the package, including financial proceeds from narcotics trafficking such as cash, money orders, or other financial instruments.
7. On or about May 7, 2020, during a review of postal mailings, your Affiant identified the Package at the Goshen Post Office, Goshen, OH. Observation of the Package indicates it is Priority Mail Express Envelope and weighs approximately 1 pound and 2 ounces. Postage paid for was \$26.35. It does not contain a business or corporate account number with the address. Both the return address and addressee information is hand-written. Through training and experience, your Affiant believes this to be indicative of a package containing drug proceeds as the label information is not characteristic of what Priority Mail Express was designed for as described in paragraph five. Your Affiant is also aware that Southern California is a known drug source location.

The Package is further described as:

Priority Mail Express, Label Number: EJ 176 363 440 US

Sender: Eric little
5662 Deerfield Rd
loveland OH 45140

Addressee: Pinterest
9114 adams ave
huntington Beach CA 92646

8. The Consolidated Lead Evaluation and Reporting (CLEAR) database system was researched by your Affiant regarding the listed return address on the Package: Eric little, 5662 Deerfeild Rd, loveland OH 45140. CLEAR is a public record data investigative platform available exclusively to law enforcement and other government investigators about people and businesses. The information obtained from the system indicated there is no Eric little associated with that address. Furthermore, 5662 Deerfield Rd., Loveland, OH 45140 is not an address recognized by the USPS. Additionally, “Deerfeild” is misspelled and it should be spelled Deerfield.
9. The CLEAR database was researched by your Affiant regarding the listed addressee on the Package: Pinterest, 9114 adams ave, huntington Beach CA 92646. The information obtained from the system indicated there is no business by the name of Pinterest associated with that address.
10. On or about May 12, 2020, your Affiant arranged for Deputy James Kirker, Clermont County Sheriff's Office, to utilize a narcotics canine to check the Package. Deputy Kirker and his canine “Paik” are a currently certified narcotics team. The team is certified by the Ohio Peace Officer Training Commission and the Office of the Attorney General (Ohio). Deputy Kirker reports that “Paik” passed all of his examinations and has successfully located hidden drugs in the past and therefore your Affiant considers “Paik” to be reliable. On the same date, your Affiant met Deputy Kirker at the Pierce Township Police Department, Cincinnati, OH 45245 where the Package was placed in separate office among several other similar packages and presented to narcotic canine, “Paik”, who alerted positively to the presence or odor of a controlled substance upon the Package.

Attached herewith, and incorporated by reference, is a photocopy of the narcotic canine handler's record of examination.

11. Based upon my experience and training, this information, along with the positive alert of narcotic canine “Paik” is indicative of the Package containing narcotics or proceeds relating thereto.

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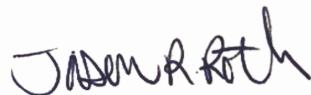
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12. Based upon the information contained in this Affidavit, your Affiant believes that there is probable cause to believe that the Package will contain evidence and/or contraband, fruits of crime, or other items illegally possessed.

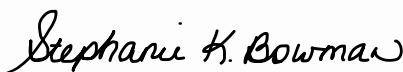
Therefore, a search warrant to open the Package is requested.

Further, your Affiant sayeth naught.



Jason R. Roth
U.S. Postal Inspector

Subscribed and sworn to and before me this 12th day of May, 2020 **via electronic means**.



Stephanie K. Bowman
United States Magistrate Judge



United States Postal Inspection Service
Pittsburgh Division

OFFICER AFFIDAVIT

I, James Kirk, AM, AND HAVE BEEN, EMPLOYED BY THE
C.C.S.O, SINCE 98. AMONG OTHER DUTIES, I AM CURRENTLY
THE ASSIGNED HANDLER OF NARCOTICS DETECTION CANINE "PAIK", WHICH IS
TRAINED AND CERTIFIED IN THE DETECTION OF THE PRESENCE OR ODOR OF NARCOTICS
DESCRIBED AS FOLLOWS:

Marijuana, Hashish, Cocaine, Heroin, Methamphetamines, Ecstasy

ON 05/12/2020, AT THE REQUEST OF POSTAL INSPECTOR J.R. ROTH I RESPONDED TO THE
950 Locust Corner rd Cincinnati OH 45245 WHERE "PAIK"
DID ALERT TO AND INDICATE UPON THE FOLLOWING DESCRIBED ITEM:

USPS Priority Mail Express, USPS Label Number: EJ 176363440 US, addressed to
Pinterest, 9114 adams ave, huntington Beach CA 92646 with a return address of Eric
little, 5662 Deerfeild Rd, loveland OH 45140.

BASED ON MY TRAINING AND EXPERIENCE AND THAT OF "PAIK", I CONSIDER THE ABOVE
DESCRIBED ITEM TO CONTAIN WITHIN OR UPON THE PRESENCE OR ODOR OF A NARCOTIC OR
OTHER DANGEROUS CONTROLLED SUBSTANCE.

James Kirk 05-12-2020
(Signature and Date)